

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GATSBY FRIMPONG, :  
: Plaintiff, :  
: :  
v. : Case No. 22-cv-10487 (GHW)(RWL)  
: :  
EVERYREALM INC., REPUBLIC COMPOUD :  
LLC, d/b/a REPUBLIC REAL ESTATE, REPUBLIC :  
OPERATIONS LLC, d/b/a REPUBLIC, OPENDEAL :  
INC., d/b/a REPUBLIC, OPENDEAL PORTAL LLC, :  
d/b/a REPUBLIC, JESSE YORIO, in his individual :  
and professional capacities, and JANINE YORIO, in :  
her individual and professional capacities, :  
: DECLARATION OF  
Defendants. : WILLIAM KERR  
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William Kerr, having personal knowledge of the facts herein, and under penalty of perjury, hereby states:

1. I currently serve as Chief Legal Officer of Everyrealm Inc. (f/k/a Republic Realm Inc.) (“Everyrealm”), and am a resident of the State of New York. I submit this Declaration based upon my personal knowledge and in support of the Motion to Compel Arbitration on behalf of Everyrealm, Janine Yorio, and Jesse Yorio (collectively “the Everyrealm Defendants”) in the above-captioned matter.

2. Plaintiff Gatsby Frimpong’s claims in this action arise out of his former employment with Everyrealm.

3. Everyrealm is an active investor in and developer of immersive media, focusing on content, infrastructure and gaming.

4. Everyrealm is a Delaware corporation with its principal place of business in New York, New York.

5. Everyrealm has operations and investors across the globe, including engineers in Croatia, investors in California, and a second office in Connecticut.

6. Everyrealm was formerly named Republic Realm Inc., but was renamed on February 3, 2022 by certificate of name change filed with the State of Delaware.

7. Attached hereto as Exhibit A is a true and correct copy of the Certificate of Name Change filed by then-Republic Realm Inc. with the State of Delaware, which officially renamed the company "Everyrealm Inc."

8. Attached hereto as Exhibit B is a true and correct copy of the Worksite Employee Acknowledgement executed by Frimpong on December 19, 2021.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury the foregoing is true and correct.

Dated: February 8, 2023



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William Kerr